

November 1, 2012

Eric H. Holder, Jr., Esq.
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

State Attorneys General
(attached as Exhibit A)

Re: Tyrone Henderson v. Verifications, Inc.
U.S. District Court for the Eastern District of Virginia (Richmond Division)
Civil Action No. 3:11-cv-514-REP
Notification under the Class Action Fairness Act of 2005

Dear Sir or Madam:

I am writing on behalf of Verifications, Inc. ("Verifications"), the Defendant in the matter of *Henderson v. Verifications, Inc.*, No. 3:11-cv-514, pending in the U.S. District Court for the Eastern District of Virginia (Richmond Division), to provide notice of a proposed class action settlement filed with the Court on October 23, 2012. This letter constitutes the required notice pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1711, *et seq.* ("CAFA").

The proposed settlement resolves a class action lawsuit brought by Plaintiff Tyrone Henderson, who alleges that Verifications violated the Fair Credit Reporting Act, 15 U.S.C. §§ 1681i and 1681k. Verifications denies that it violated the FCRA and otherwise denies liability.

Pursuant to CAFA Section 1715(b)(1) through (8), the following documents are provided on the enclosed CD:

- (1) Plaintiff's Class Complaint (filed August 10, 2011) and First Amended Complaint (filed February 7, 2012).
- (2) An Excel Spreadsheet identifying the class members by name and state of residence, as best we can determine.

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- (3) A chart identifying the estimated proportionate share of the claims of the class members in the 1681k Class and 1681i Class in each state to the entire settlement.
- (4) Preliminary Approval Motion, supporting memorandum, proposed order and exhibits. On October 23, 2012, Plaintiff filed a Motion for Agreed Order Granting Preliminary Approval of Settlement, Certifying Class for Purposes of Settlement, Appointing Class Counsel, Directing Notice to the Class And Scheduling Fairness Hearing. The Settlement Agreement and Release is attached as an exhibit to the Memorandum in Support of the Motion. On October 24, 2012, Plaintiff filed a Notice of Filing Exhibit to Plaintiff's Memorandum in Support of Motion for Agreed Order, attaching a fully executed copy of the Settlement Agreement and Release.

The Court issued an informal electronic Order on PACER scheduling a hearing on Preliminary Approval of the Class Settlement for November 5, 2012 at 10 a.m. in the U.S. District Court for the Eastern District of Virginia (Richmond Division), Spottswood W. Robinson III and Robert R. Merhige, Jr. Federal Courthouse, 701 East Broad Street, Richmond, VA 23219 before the Honorable Robert E. Payne.

There are no judicial opinions relating to the Settlement Agreement and Release or the proposed notice plan. Likewise, there is no final judgment or notice of dismissal. Class counsel and counsel for the Defendant did not contemporaneously make any settlement or other agreement that is not included in the Settlement Agreement and Release.

As part of the settlement, the Notice Administrator will maintain a settlement website that will be operational shortly after the Court grants preliminary approval of the proposed settlement. The website address is still being determined. The website will contain updated materials pertinent to the settlement and the Court approval process, including the scheduling of the final approval hearing.

If you have any questions about the above-captioned class action settlement, please do not hesitate to contact me.

Sincerely yours,

Megan S. Ben'Ary

MSB/cg

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Enclosures (Exhibits and CD)

cc: Leonard A. Bennett, Esq.
Susan M. Rotkis, Esq.
Dale W. Pittman, Esq.
Matthew J. Erausquin, Esq.
Charles K. Seyfarth, Esq.